

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday and
Holiday Collections

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Docket No. C2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-1-14)
May 22, 2001

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-

1). Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.


“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,


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OCA/USPS-1. The following interrogatories refer to the mail pickup times listed on USPS mail collection boxes. Also, please refer to POM 8, section 313.1 and 313.2

- (a) Do sections 313.1 and 313.2 reflect the Postal Service's policy regarding mail pickup times? If not, please provide a copy of the publication that states the Postal Service's actual policy.
- (b) Section 313.1 indicates that collections be made "as near as possible to the posted pickup time, but not before posted times for specific trips."
 - (1) For each of the past five years, is the Postal Service aware of any mail being picked up prior to posted times? Please identify all documents examined in preparing this response.
 - (2) If your response to part '(b)(1)' of this interrogatory is affirmative, please indicate when and under what circumstances mail was picked up prior to the times posted on collection boxes?
- (c) For FY 2000, what volume of mail was picked up earlier than the posted collection times? For each instance of an early pickup time, please provide the volume of collection mail picked up on the following day.
- (d) POM 8 section 313.2 indicates that "motorized collections ... should be made no later than 20 minutes after the posted time." What is the Postal Service's current policy regarding mail pick-ups occurring after the time(s) posted on collection boxes? Please provide a copy of the publication that states the Postal Service's actual policy.
- (e) Please describe the impact upon further mail processing when collection mail is picked up later than the designated time posted on the box.

- (f) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream via mail collection boxes.
- (g) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream on Sundays via mail collection boxes.
- (h) For each of the past five years and delineated by holiday, please provide: (1) an estimate of the quantity of mail entered into the U.S. postal mail stream on the designated holiday via collection boxes, and (2) the volume of mail entered into the U.S. postal mail stream via collection boxes on the day following the specified holiday.
- (i) For each of the past five years, please provide all information available on the frequency and accuracy of collection box pickup times. Also, include in the data provided the volume of mail per collection box per pickup. If the information is available in electronic format, provide the data as an ASCII formatted file with a description of the data to include but not limited to field descriptions, field length and field format.

OCA/USPS-2. The following is quoted from section 313.5 of POM Issue 8, July 16, 1998 updated through May 4, 2000. "When a holiday falls on a Monday, a collection must be made from all collection boxes on either Sunday or the Monday holiday."

- (a) Does the Postal Service pick up mail on either Sunday or the Monday holiday when the holiday falls on a Monday?
- (b) When a holiday falls on a Monday, how is the general public informed of the Sunday or Monday holiday collection time?
- (c) Who determines when the box collections will be made?

- (d) If your response to part (a) of this interrogatory is other than affirmative, please explain why section 313.5 of POM Issue 8 has not been revised to reflect the Postal Service's actual practice.

OCA/USPS-3. The following refers to POM Issue 8, July 16, 1998, updated through May 4, 2000. Section 314 mentions quarterly "collection tests."

- (a) Please provide a copy of the plastic collection test card D-1148 and Form 3702, Test Mailing Record (Collection and special test mailings).
- (b) Please provide a current copy of Handbook M-39, Management of Delivery Services.
- (c) How many years has the Postal Service conducted the "collection tests?"
- (d) Who is responsible for conducting the collection tests?
- (e) How is the information gathered from the collection tests used by USPS management?
- (f) For each of the past five years, please provide a copy of each data analysis performed and all reports provided management regarding the collection test results.

OCA/USPS-4. The following interrogatory refers to the Postal Service's formula for calculating the percentage of mail delivered on time.

- (a) Please provide the current formula used to calculate the percentage of mail delivered on time. If the calculation used differs depending on the class or subclass of mail, please provide each formula used and identify the applicable mail class or subclass.

(b) In determining the number of days it takes to deliver a mail piece, please provide the following information:

(1) Does the Postal Service include each and every day of a Julian calendar year when calculating the number of delivery days?

(2) If the response to part (b)(1) of this interrogatory is other than affirmative, please specifically identify each and every day that would not be included in the calculation of the number of days to deliver.

OCA/USPS-5 Who is responsible for establishing the USPS mail collection box pickup times?

OCA/USPS-6. Who is responsible for monitoring the timeliness of collection box pickups?

OCA/USPS-7. Where is collection box mail taken once it has been retrieved? For example, the local DDU, SCF or BMC?

OCA/USPS-8. Who is responsible for coordinating collection box pickups and then transporting that box mail to a mail processing facility?

OCA/USPS-9. Describe all methods used to monitor the timeliness of USPS collections from collection boxes.

OCA/USPS-10. Describe all methods used to track the processing of collection box mail once it has been retrieved from the box.

OCA/USPS-11. When a holiday eve falls on a day other than Sunday, does the USPS have a *national* policy regarding mail pick-up and mail processing for the holiday-eve service (for example, December 24 and December 31)? If so, please provide a copy of the current policy.

OCA/USPS-12. Has the USPS conducted or does it know of any analysis performed that studies customers' perceptions of the type of service mail receives after it is deposited in a USPS street collection box? If so, please provide a copy of the analysis. If none has been performed, please explain why none has been conducted.

OCA/USPS-13. The following interrogatory refers to POM Issue 8, July 15, 1998, updated through May 4, 2000.

(a) Section 315.1 refers to the decals prescribed by the Corporate Identity Policy at Headquarters and Handbook MS-22, Street Letter Box Maintenance.

(1) Please provide a current copy of the Corporate Identity Policy.

(2) Please provide a current copy of Handbook MS-22.

(b) Section 321.4 states: "These collection times should be augmented as necessary to ensure that local mail deposited in these boxes meets established delivery service standards."

(1) Does mail deposited in a collection box have a unique set of delivery service standards? If so, please provide a copy of the unique standards.

(2) For each and every mail class and subclass, please provide a copy of the established delivery service standards.

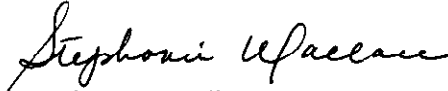
OCA/USPS-14. The following interrogatory refers to two documents. The first document is Exhibit 1, page 2 of the document entitled Douglas F. Carlson Complaint on Sunday and Holiday Collections, Docket No. C2001-1, dated October 23, 2000, docketed October 27, 2000. Exhibit 1, page 2 is the Postal Service's response to DFC/USPS-3. The Postal Service states in its response, "The Postal Service policy is not to conduct Sunday collections or outgoing processing of First-Class Mail except

during the holiday season or as a contingency for unusual circumstances.” The second document is POM Issue 8, July 16, 1998, updated with Postal Bulletin revision through May 4, 2000, section 322.233. “Sunday and holiday pickups should be at least once a day, as late as possible to ensure that the mail will connect with dispatches of value to meet established standards.”

- (a) Please explain why POM section 322.233 has not been updated to reflect the apparent discrepancy in Sunday and holiday collections with the Postal Service's practice as reflected in the Postal Service's response to DFC/USPS-3?
- (b) As defined in section 322.233 of POM Issue 8, please define the term “dispatches of value.”

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
May 22, 2001